



Technical Bulletin 1.3.1

GMA Updates: Using Population Data

Key Issue This bulletin provides guidance for using population data to cities and counties “fully planning” under the Growth Management Act (GMA). The Update schedule established by RCW 36.70A.130(4), updated by ESHB 2171 in 2005, and amended by ESSB 6427 in 2006, requires each city and county in Washington to take action to review and, if needed, revise its comprehensive plan and development regulations to ensure they comply with the GMA. [See RCW 36.70A.130(1).]

The Update requires that fully planning counties and cities include an analysis of the population allocated to a city or county from the most recent ten-year population forecast by OFM in their Update. Counties and cities also need to decide whether this analysis will include a review of its UGA as required by RCW 36.70A.30(3).

Discussion The deadlines for GMA Updates and review of urban growth areas (UGAs) are not always concurrent. Many jurisdictions wrestle with when and how to incorporate the Office of Financial Management’s (OFM) population forecasts into the Update in meeting four key deadlines:

1. **GMA Update:** According to a schedule established by the RCW 36.70A.130(4), and every seven years thereafter, counties and cities must review and revise their plans and regulations.
2. **Critical Areas Ordinance Extension:** ESHB 2171 extended the deadline for critical area ordinances for some counties and cities within them, for one additional year.
3. **GMA Update Timeline Extension:** ESSB 6427 provides a three-year window to small and slow growing jurisdictions with 2005-2007 update deadlines for comprehensive plan and development regulation updates, including the critical areas ordinance. [See *Technical Bulletin 1.4.1*]
4. **Urban Growth Area Review:** At least every ten years, jurisdictions must review UGAs, including densities, pursuant to RCW 36.70A.130(3), and make changes if needed. The statute states: “The county comprehensive plan designating urban growth areas, and the densities permitted in the urban growth areas by the comprehensive plans of the county and each city located within the urban growth areas, shall be revised to accommodate the urban growth projected to occur in the county for the succeeding 20-year period.”

While these deadlines are not concurrent, the Central Puget Sound Hearings Board clarified that the ten-year UGA Review deadline is triggered by the statutory deadline for designation of Urban Growth Areas under the GMA.¹

Population data requirements

OFM provides 20-year population forecasts on a county-by-county basis expressed in a range from high to low. Each county consults with its cities and allocates the projected population projection among the county and cities. Sometimes county-wide planning policies outline the collaborative process.

The last time OFM issued a 20-year forecast was in January 2002. Note that changes to population projects may trigger other adjustments to other comprehensive plan elements, including transportation, housing, capital facilities, and parks.

Since the deadline for updating GMA plans and regulations does not coincide with the deadline for evaluating UGAs for some jurisdictions, local governments have discretion and flexibility to decide how to handle OFM population projections in their Update process. RCW 36.70A.130(1)(b) does require counties and cities to include an analysis of the population allocated to a city or county from the most recent ten-year population forecast by OFM in their Update.

Local options for using population forecasts in the GMA Update process

Local governments have three basic options, as follows, for using population forecasts in their GMA Update processes. They may choose the one that is most suitable for their situation, depending in part on how the jurisdictions are approaching the Update process and how much the population projections for a county have changed. Some variations, of course, may be possible for each of the basic options listed below.

- **Continue with existing county-wide population projections.**
Counties whose GMA Update deadline occurs before their next deadline for a UGA Review could use this option. A county and the cities within it could retain their existing population forecast allocations during their GMA Update process, assuming these allocations are consistent with OFM's previous forecast and with the county-wide planning policies. Jurisdictions choosing this option would not immediately reallocate the population projections, nor would they immediately incorporate the latest OFM forecast into either their plans or, under RCW 36.70A.130(3), their UGA Review. Instead, the new population allocation for individual jurisdictions, along with an evaluation of

¹ *1000 Friends and Harless v. Kitsap Co*, CPSGMHB 04-3-0031c FDO, pp 29-36 (6/28/05) clarifies that the initial deadline for designating UGAs is found in RCW 36.70A.040(3) and RCW 36.70A.110(5) for counties and cities that were made subject to the full planning requirements of the GMA when it was enacted. Earlier versions of this Technical Bulletin suggested that if a growth management hearings board (GMHB) had found the majority of a jurisdiction's UGAs out of compliance, then the deadline for evaluation of UGAs would become ten years from the date that the GMHB finds the majority of a jurisdiction's UGAs in compliance. In *1000 Friends*, the CPSGMHB clarified that a finding of noncompliance does not "reset the clock" for the required ten-year UGA review.

UGAs and densities, would occur after the GMA Update is completed, but prior to the local deadline for the UGA Review. However, counties and cities choosing this option would need to discuss in their updated plan how the new population projections and future county population allocations might affect their plan and include a strategy for incorporating the new population projections and county population allocations in their plan.

- **Use the new OFM county-wide population forecasts.**

Using the new population forecasts triggers the requirement for a review of UGAs and densities, pursuant to RCW 36.70A.130(3). Therefore, this option would involve performing the GMA Update and UGA Review concurrently.

In deciding how to spread the county-wide growth, the county, in collaboration with the cities within the county, will need to allocate the new population forecasts among the jurisdictions. The usual requirements for public process and consistency with other laws still apply.

- **Develop county's own population projections and reallocate county population based on these projections.**

Counties, in cooperation with cities within the county, could develop their own population projections so long as the projections are based on reliable sources of information and consistent with other GMA requirements. A county and its cities using this approach would then: (a) implement the county process to "divide up" or allocate the population projection among the respective jurisdictions; and (b) evaluate their UGAs and densities as part of their GMA Update process. Therefore, this option involves performing the GMA Update and UGA Review concurrently. Jurisdictions using this approach should be aware that **their population projections and OFM's should be substantially consistent**; if they are not, they should consult with OFM on the differences. On the rare occasion that OFM and a county could not agree on the population forecasts for that county, a county can appeal OFM's population forecast to a Growth Management Hearings Board.

Issues to consider when doing a UGA Review

Here are some questions to consider when undertaking a UGA Review that includes population data, pursuant to RCW 36.70A.130(3).

Counties

- ☐ What is the percentage of growth that has occurred since adoption of the comprehensive plan in rural areas compared to urban areas?
- ☐ Is this growth consistent with the targets in your comprehensive plan or county-wide planning policies?
- ☐ What residential densities are allowed in rural areas and unincorporated UGAs?
- ☐ How much land is devoted to each type of density?
- ☐ Do these densities need revision in order to meet adopted growth targets for urban and rural areas?

Cities

- ❑ What is the average urban density within your city?
- ❑ What is the average urban density within your unincorporated UGA?
- ❑ What mechanisms have you used to encourage urban densities within your city? Are these densities consistent with targets established in your comprehensive plan?
- ❑ Do these densities need to be revised to meet any adopted growth targets in the county-wide planning policies and to meet your population allocation?

Buildable Lands Counties: RCW 36.70A.215, the “buildable lands” statute applies to the counties of Snohomish, King, Pierce, Kitsap, Thurston, and Clark and the cities within their borders. Starting September 1, 2002, and every five years thereafter, “buildable lands jurisdictions” must complete evaluation of certain data, including whether there is sufficient suitable land to accommodate the county-wide population projection. The statute also requires these jurisdictions “to adopt and implement measures” if necessary to increase consistency based on the evaluation. This implementation step occurs after the evaluation is complete and may be combined with the Urban Growth Area Review under RCW 36.70A.130(3). The statute does not identify a specific deadline. [Refer to *Buildable Lands Program Guidelines* at 222.cted.wa.gov/growth.]

Resources These publications are available at www.cted.wa.gov/growth.

Buildable Lands Program Guidelines, Department of Community, Trade and Economic Development, June 2000

The Art and Science of Designating Urban Growth Areas, Part II: Some Suggestions for Criteria and Densities, Department of Community, Trade and Economic Development, March 1992.

Keeping the Rural Vision: Protecting Rural Character and Planning for Rural Development, Department of Community, Trade and Economic Development, June 1999.

Predicting Growth and Change in Your Communities, A Guide to Subcounty Population Forecasting, Department of Community, Trade and Economic Development, June 1995.

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